

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

Civil Action No.

04-CV-10357-RCL (Sorokin, U.S.M.J.)

ECF Case

**PLAINTIFF'S STATEMENT PURSUANT TO
FED. R. CIV. P. 16(b) and LOCAL RULE 16.1**

Plaintiff Sheldon G. Adelson submits the following Statement pursuant to Fed. R. Civ. P. 16(b) and Local Rule 16.1. Adelson's counsel have conferred with counsel for Hananel. The position of Hananel's counsel is that any substantive discussions regarding a discovery schedule should be deferred until after a ruling on the Motion to Stay and Motion to Extend Time to Answer.

(1) Proposed Discovery Plan and Schedule for Filing Motions

Adelson's proposed schedule for discovery and motions is appended below.

(2) Certification of Counsel

Adelson's attorneys certify that they have conferred with their client about
(a) establishing a budget for the costs of litigation (both full course and alternative courses) and
(b) resolving this action by alternative dispute resolution.

(3) Trial By Magistrate Judge

Adelson consents to trial by Magistrate Judge.

PROPOSED DISCOVERY PLAN

Last date for parties to serve the information identified in Fed. R. Civ. P. 26(a)(1) and L.R. 26.1(B).	March 14, 2008
Last date for filing motion to amend pleadings.	April 11, 2008
Close of fact discovery.	May 16, 2008
Last date for filing of summary judgment motions.	May 30, 2008
Last date for filing oppositions to summary judgment motions.	June 13, 2008
Last date for filing replies in support of summary judgment motions.	June 20, 2008

February 22, 2008

Plaintiff,
SHELDON G. ADELSON
By His Attorneys,

/s/ Andrew H. Schapiro
Andrew H. Schapiro
Christopher J. Houpt
MAYER BROWN LLP
1675 Broadway
New York, NY 10019
(212) 506-2672

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on February 22, 2008.

/s/ Andrew H. Schapiro
Andrew H. Schapiro

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CERTIFICATION PURSUANT TO LOCAL RULE 16(d)(3)

Pursuant to Local Rule 16(d)(3), Plaintiff Sheldon G. Adelson and his counsel, Andrew H. Schapiro, attest that they have conferred:

(a) with a view to establishing a budget for the costs of conducting the full course — and various alternative courses — of the litigation; and

(b) to consider the resolution of the litigation through the use of alternative dispute resolution programs such as those outlined in Local Rule 16.4.

February 22, 2008

Respectfully submitted,

/s/ Andrew H. Schapiro

MAYER BROWN LLP

Andrew H. Schapiro

Christopher J. Houpt

1675 Broadway

New York, New York 10019

(212) 506-2500

SHELDON G. ADELSON,

by his authorized representative:

/s/ Franklin H. Levy
Franklin H. Levy